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June 19, 2025

VIA ELECTRONIC MAIL

Hon. John P. Cronan  
United States District Court for the Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312  
[CronanNYSDChambers@nysd.uscourts.gov](mailto:CronanNYSDChambers@nysd.uscourts.gov)

**Re:** *Sean Combs v. Burgess, et al.*, Civil Action No. 1:25-cv-00650  
**Letter Motion for Extension of Time to Respond to Complaint**

Your Honor:

I represent Defendant Ariel Mitchell in the above-referenced action. I write to respectfully requests an extension of Mitchell Defendant's deadline to answer, move, or otherwise respond to Plaintiff's Complaint.

Pursuant to Your Honor's Individual Rules and Practices in Civil Cases, Ms. Mitchell states the following:

1. **Current Deadline:** The current deadline for Ms. Mitchell to respond to the Complaint is June 23, 2025.
2. **Requested Extension:** Ms. Mitchell requests an extension of the deadline to July 7, 2025.
3. **Reason for Extension:** The additional time is necessary to continue to investigate, and determine the validity of defenses and potential counter and cross claims. As Mitchell's defense counsel, I was only engaged recently, so my independent investigations are still in progress.

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Further, Ms. Mitchell is currently outside the country, where there is a 12-hour time difference, making real-time communication and coordination with counsel exceptionally difficult. These circumstances have significantly impacted the ability to efficiently prepare a response.

4. **First Request:** This is Ms. Mitchell's first request for an extension. The Court did *sua sponte* provide additional time for Mitchell's response from June 16, 2025 to June 23, 2025. (*See* ECF Doc. 42).
5. **Consent:** Counsel for Plaintiff, Erica A. Wolff, Sher Tremonte LLP, consents to this request.
6. **No Prejudice:** The requested extension will not prejudice any party or affect any other scheduled dates.

I thank everyone in advance for your attention on this request.

Respectfully submitted,

/s/ Steven A. Metcalf  
STEVEN A. METCALF II, ESQ.

CC: Erica A. Wolff, Sher Tremonte LLP (via ECF and email)

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